

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

IN RE YASMIN AND YAZ)	3:09-MD-02100-DRH-CJP
(DROSPIRENONE) MARKETING,)	
SALES PRACTICE AND PRODUCTS)	MDL No. 2100
LIABILITY LITIGATION)	
_____)	Honorable David R. Herndon
)	
This Document Relates to:)	
)	
ALL Cases)	
_____)	

**MOTION OF COOPERATING PLAINTIFFS' COUNSEL
FOR APPOINTMENT OF AN ORGANIZATIONAL TEAM**

Plaintiffs respectfully request that this Honorable Court appoint counsel to act on behalf of Plaintiffs in this complex pharmaceutical litigation. The litigation presents several significant factual and legal issues in which Plaintiffs must prevail against a well financed and ably defended international corporation. As such, the timely appointment of experienced Plaintiff counsel who are well versed in pharmaceutical mass tort litigation in general, and in the science of hormonal contraceptives in particular, will serve the best interests of all plaintiffs in these multidistrict proceedings.

In addition, the undersigned counsel understand that successful pursuit of any pharmaceutical mass tort requires not only zealous advocacy, but also professionalism, cooperation and courtesy. As experienced Plaintiff Counsel, the Movants understand their obligation to this Court and to the Defendant to act in a manner which promotes the “just, speedy and inexpensive determination” of this action, to avoid needless controversy and confrontation, and to always place the clients’ best interests at the forefront.

Movants therefore respectfully request that the Court appoint the proposed organizational team as soon as practicable as set forth in the Memorandum in Support of Motion of Cooperating Plaintiffs' for Appointment of an Organization Team, filed simultaneously herewith.

Respectfully Submitted,

SCHLICHTER, BOGARD, & DENTON, LLP

BURG, SIMPSON, ELDREDGE, HERSH &
JARDINE, PC

/s/ Jerome J. Schlichter

Jerome J. Schlichter
Roger C. Denton
Kristine K. Kraft
100 S. 4th Street, Suite 900
St. Louis, MO 63102
314-621-6115 (phone)
314-621-7151 (fax)
jschlichter@uselaws.com
rdenton@uselaws.com
kkraft@uselaws.com

Illinois Office:
120 W. Main Street, Suite 208
Belleville, IL 62220

Mike Papantonio
Timothy O'Brien
LEVIN, PAPANTONIO, THOMAS,
MITCHELL, ECHSNER, PROCTOR, P.A.
316 South Baylen Street, Ste. 600
Pensacola, FL 32502-5996
850-435-7000 (phone)
850-435-7020 (fax)
mpapantonio@levinlaw.com
tobrien@levinlaw.com

/s/ Janaet Abaray (with consent)

Janet Gilligan Abaray
312 Walnut Street
Suite 2090
Cincinnati, OH 45202-0330
jabaray@burgsimpson.com

Michael S. Burg
40 Inverness Drive East
Denver, CO 80112
888-895-2080 (phone)
mburg@burgsimpson.com

Michael London
Gary Douglas
DOUGLAS & LONDON, LLP
111 John Street
14th Floor
New York, NY 10038
212-566-7500 (phone)
212-566-7501 (fax)
mlondon@douglasandlondon.com
gdouglas@douglasandlondon.com

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of October, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Attorneys for Defendants Bayer Corporation, Bayer Healthcare LLC, Bayer Healthcare Pharmaceuticals, Bayer Pharmaceuticals Corporation, Bayer Schering Pharma AG, Belex Laboratories, Inc., and Berlex, Inc.:

Robert Alan Amicone, II Squire Sanders & Dempsey 221 E. Fourth St. Suite 2900 Cincinnati, OH 45202 513-361-1200 513-361-1201 (fax) ramicone@ssd.com	Paul E Benson Michael Best & Friedrich LLP 100 E Wisconsin Ave - Ste 3300 Milwaukee, WI 53202-4108 414-271-6560 414-277-0656 (fax) pebenson@michaelbest.com
Albert G. Bixler Eckert, Seamans et al-Philadelphia Two Liberty Place 50 South 16th St, 22nd Floor Philadelphia, PA 19102 215-851-8412 abixler@eckertseamans.com	Michael E. Donelson Fox, Galvin LLC Generally Admitted One South Memorial Drive 12th Floor St. Louis, MO 63102 314-588-7000 314-588-1965 (fax) mdonelson@foxgalvin.com
Elizabeth S. Gallard Eckert, Seamans et al-Philadelphia Two Liberty Place 50 South 16th St, 22nd Floor Philadelphia, PA 19102 215-851-8418 egallard@eckertseamans.com	John E. Galvin Fox, Galvin LLC Generally Admitted One South Memorial Drive 12th Floor St. Louis, MO 63102 314-588-7000 314-588-1965 (fax) jgalvin@foxgalvin.com

<p>Robert E. Haffke Squire, Sanders & Dempsey - Cleveland 4900 Key Tower 127 Public Square Cleveland, OH 44114 216-479-8500 216-479-8780 (fax) rhaffke@ssd.com</p>	<p>Adam L. Hoeflich Bartlit, Beck et al. 54 West Hubbard Street Suite 300 Chicago, IL 60654 312-494-4400 adam.hoeflich@bartlit-beck.com</p>
<p>Terry Lueckenhoff Fox Galvin, LLC Generally Admitted One S. Memorial Drive 12th Floor St. Louis, MO 63102 314-588-7000 tlueckenhoff@foxgalvin.com</p>	<p>Sarah K. Rathke Squire, Sanders & Dempsey - Cleveland 4900 Key Tower 127 Public Square Cleveland, OH 44114 216-479-8379 216-479-8780 (fax) srathke@ssd.com</p>
<p>Bernard Taylor Alston & Bird One Atlantic Center 1201 West Peachtree Street Atlanta, GA 30309-3424 404-881-7000 btaylor@alston.com</p>	<p>Joseph C. Weinstein Squire, Sanders et al. - Cleveland 4900 Key Tower 127 Public Square Cleveland, OH 44114-1304 jweinstein@ssd.com</p>
<p>Shirli Fabbri Weiss DLA Piper LLP (US) 401 B Street, Suite 1700 SAN DIEGO, CA 92101 619-699-3650 619-699-2701 (fax) shirli.weiss@dlapiper.com</p>	<p>Christopher Munro Young DLA Piper, US LLP 4365 Executive Drive Suite 1100 San Diego, CA 92101-2133 858-638-6818 chris.young@dlapiper.com</p>

<p>Scott Michael Zimmerman Heidell, Pittoni, Murphy & Bach, LLP 99 Park Avenue New York, NY 10016 212-826-8585 212-490-8966 (fax) szimmerman@hpmb.com</p>	
--	--

Attorney for Defendant Walgreens:

<p>Denise E. Baker-Seal Brown & James - Belleville Generally Admitted 120 West Main Street Second Floor Belleville, IL 62221 618-235-5590 dseal@bjpc.com</p>	
---	--

Attorneys for Plaintiffs:

<p>Janet G. Abaray Burg, Simpson et al.-Cincinnati 312 Walnut Street Suite 2090 Cincinnati, OH 45202-0330 jabaray@burgsimpson.com</p>	<p>Rachel Beth Abrams Levin Simes Kaiser & Gornick 44 Montgomery Street, 36th Floor San Francisco, CA 94104 415-646-7160 rabrums@lskg-law.com</p>
<p>Robert Frederick Arentz Pacific Law Center 4225 Executive Square #1550 La Jolla, CA 92037</p>	<p>Pamela A. Borgess Zoll, Kranz & Borgess Ste. 200 6620 Central Avenue Toledo, OH 43617 419-841-9623 419-841-9719 (fax) pamela@toledolaw.com</p>

<p>Evan D. Buxner Walther Glenn Law Associates Generally Admitted 10 South Brentwood Boulevard Suite 102 St. Louis, MO 63105 314-725-9595 BUXNER@WALTHER-GLENN.COM</p>	<p>Elizabeth J. Cabraser Lieff, Cabraser et al. - San Francisco, CA 275 Battery Street 30th Floor San Francisco, CA 94111 415-956-1000 415-956-1008 (fax) ecabraser@lchb.com</p>
<p>Thomas P. Cartmell Wagstaff & Cartmell 4740 Grand Avenue Suite 300 Kansas City, MO 64112 816-701-1100 816-531-2372 (fax) tcartmell@wcllp.com</p>	<p>Robert F. Clarke Clarke Law Offices 2701 E. Camelback Rd. Suite 140 Phoenix, AZ 85016 602-952-3232 602-952-3233 (fax) BOB@CLARKELAW-AZ.COM</p>
<p>Andrew J. Cross Carey & Danis LLC Generally Admitted 8235 Forsyth Boulevard Suite 1100 St. Louis, MO 63105-3786 314-725-7700 314-721-0905 (fax) across@careydanis.com</p>	<p>.J. DeBartolomeo Girard Gibbs LLP 601 California Street Suite 1400 San Francisco, CA 94108 415-981-4800 AJD@girardgibbs.com</p>
<p>Lowell W. Finson Phillips & Associates Qwest Building, 26th Floor 20 East Thomas Road Suite 2600 Phoenix, AZ 85012 602-258-800 lowell@phillipslaw.ws</p>	<p>Joseph H. Fowler Hartley, Rowe & Fowler P.O. Box 489 6622 East Broad Street Douglasville, GA 30133-0489 770-920-9119 jfowler@hrflegal.com</p>

<p>Steven D. Gacovino Gacovino, Lake & Associates, P.C. 270 West Main Street Sayville, NY 11782 (631)543-5400 (631)543-5450 (fax) s.gacovino@gacovinolake.com</p>	<p>Daniel N. Gallucci Roda & Nast 801 Estelle Drive Lancaster, PA 17601 717-892-3000 dgallucci@rodanast.com</p>
<p>Steven M. Goldberg Law Office of Steven M. Goldberg Ste. 103 34055 Solon Road Solon, OH 44139 440-519-9900 887-464-4652 (fax) steven@smglegal.com</p>	<p>Mark Craig Goodman Squire, Sanders & Dempsey L.L.P. Litigation Dept. One Maritime Plaza Suite 300 San Francisco, CA 94111-3492 415-954-0289 415-393-9887 (fax) mgoodman@ssd.com</p>
<p>Eric D. Holland Holland, Groves et al. Generally Admitted 300 North Tucker Boulevard Suite 801 St. Louis, MO 63101 314-241-8111 ericdholland@yahoo.com</p>	<p>Michelle L. Kranz Zoll, Kranz & Borgess Ste. 200 6620 Central Avenue Toledo, OH 43617 419-841-9623 419-841-9719 (fax) michelle@toledolaw.com</p>
<p>Mitchell M. Kraus Transportation Communications International Union Assistant General Counsel Three Research Place Rockville, MD 20850 301-840-8776 301-330-8776 (fax) krausm@tcunion.org</p>	<p>Jeffrey M. Kuntz Wagstaff & Cartmell 4740 Grand Avenue Suite 300 Kansas City, MO 64112 816-701-1100 816-531-2372 (fax) jkuntz@wcllp.com</p>

Richard David Lambert Lindsay & Stonebarger 620 Coolidge Drive Suite 225 Folsom, CA 95630 (916) 294-0002 (916) 294-0012 (fax) rlambert@lindstonelaw.com	Arnold Levin Levin, Fishbein et al. 510 Walnut Street Suite 500 Philadelphia, PA 19106-3697 215-592-1500 alevin@lfsblaw.com
James M. Lindsay 815 Reba Place, #202 Evanston, IL 60202 916-294-0002 916-294-0012 (fax) jlindsay@lindstonelaw.com	Brian K Matise Burg Simpson Eldredge Hersh & Jardine PC 40 Inverness Dr E Englewood, CO 80112 303-792-5595 303-708-0527 (fax) bmatise@burgsimpson.com
Joanne E. Matusko Roda & Nast 801 Estelle Drive Lancaster, PA 17601 717-892-3000 717-892-1200 (fax) jmatusko@rodanast.com	David A. Nester Nester & Constance Generally Admitted 123 West Washington Street Belleville, IL 62220 618-234-4440 nesterconstance@sbcglobal.net
Mark R. Niemeyer Onder, Shelton et al 110 East Lockwood, 2nd Floor Webster Groves, MO 63119 niemeyer@onderlaw.com	Christopher L. Schnieders Wagstaff & Cartmell 4740 Grand Avenue Suite 300 Kansas City, MO 64112 816-701-1100 816-531-2372 (fax) cschnieders@wagstaffcartmell.net

<p>Gene Joseph Stonebarger Lindsay & Stonebarger 620 Coolidge Drive Suite 225 Folsom, CA 95630 916-294-0002</p>	<p>Gerald B. Taylor The Taylor Law Firm 7208 Fairwoods Place Montgomery, AL 36117 (334)775-1025 (334)775-1022 (fax)</p>
<p>Calvin S. Tregre, Jr. Burg Simpson Eldredge Hersh Jardine - Cincinnati Ste. 2090 312 Walnut Street Cincinnati, OH 45202 513-852-5600 513-852-5611 (fax) ctregre@burgsimpson.com</p>	<p>Ralph Vallone, Jr. Ralph Vallone Jr. Law Office Son Sid Cond, Suite 1 1319 Ashford Avenue Santurce, PR 00907 787-723-9393 rv@rvallonelawoffice.com</p>
<p>David W. Zoll Zoll, Kranz & Borgess LLC 6620 West Central Avenue Suite 200 Toledo, OH 43617 419-841-9623 david@toledolaw.com</p>	

/s/ Jerome J. Schlichter
Jerome J. Schlichter